



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

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PART 70 OPERATING PERMIT and ENHANCED NEW SOURCE REVIEW OFFICE OF AIR MANAGEMENT

**Jefferson Smurfit Corporation (U.S.)
301 South Butterfield Road
Muncie, Indiana 47303**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 035-5970-00009	
Issued by: <i>J. G. McCabe</i> Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 25, 1999

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary folding carton manufacturing source.

Responsible Official:	Fred Meier
Source Address:	301 South Butterfield Road, Muncie, Indiana 47303
Mailing Address:	301 South Butterfield Road, Muncie, Indiana 47303
SIC Code:	2657
County Location:	Delaware
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major Source, under PSD Rules;
	Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) solvent-based seven (7) station, thirty-six (36) inch wide roll-to-roll gravure press, known as EU-51, installed in 1969, exhausted through Stacks 1, 2 and 3, capacity: 9,000 pounds of cartons per hour.
- (b) One (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press known as EU-52, installed on June 15, 1980, equipped with a thermal oxidizer, known as EU-52-I, rated at 12.8 million British thermal units per hour, exhausted through Stack 4, capacity: 14,500 pounds of cartons per hour.
- (c) One (1) water-based three (3) station forty-six (46) inch wide press, consisting of two (2) flexographic printing stations and one (1) gravure station, known as EU-31, exhausted through Stack 5, installed in 1968, capacity: 6,000 pounds of cartons per hour.
- (d) Three (3) cyclone scrap separators, known as EU-C1, EU-C2, and EU-C3, all installed in 1979, exhausted through Stacks 6, 7 and 8, capacity: 1 ton of carton scrap per hour, each
- (e) One (1) cleanup and wash tank, identified as EU-WT, exhausted to Stack 9, installed in 1991, capacity: 4.77 gallons per day of solvent consumption.
- (f) Two (2) solvent storage tanks, identified as EU-ST-1 and EU-ST-2, installed in 1993, capacity: 15,000 gallons, each.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B **GENERAL CONDITIONS**

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application forms, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- (1) The applicable requirements are included and specifically identified in this permit; or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.
- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the

Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this

permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

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Permit Reviewer: MES

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- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation, except when the emission units are operated in such a manner that there are no regulated emissions from these emission units.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control

The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Temperature Gauge Specifications

Whenever a condition in this permit requires the measurement of temperature at any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on October 29, 1998.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify

the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation,

these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and

emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) solvent-based seven (7) station, thirty-six (36) inch wide roll-to-roll gravure press, known as EU-51, installed in 1969, exhausted through Stacks 1, 2 and 3, capacity: 9,000 pounds of cartons per hour.
- (b) One (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press known as EU-52, installed on June 15, 1980, equipped with a thermal oxidizer, known as EU-52-I, rated at 12.8 million British thermal units per hour, exhausted through Stack 4, capacity: 14,500 pounds of cartons per hour.
- (c) One (1) water-based three (3) station forty-six (46) inch wide press, consisting of two (2) flexographic printing stations and one (1) gravure station, known as EU-31, exhausted through Stack 5, installed in 1968, capacity: 6,000 pounds of cartons per hour.
- (e) One (1) cleanup and wash tank, identified as EU-WT, exhausted to Stack 9, installed in 1991, capacity: 4.77 gallons per day of solvent consumption.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the thermal oxidizer shall operate at all times that EU-52 is in operation. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,260 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum ninety percent (90%) destruction of the volatile organic compound (VOC) captured.
- (b) When operating the thermal oxidizer to achieve the limit for rule 326 IAC 8-5-5, the thermal oxidizer shall maintain a minimum ninety-three and six-tenths (93.6) percent capture efficiency and ninety (90) percent destruction efficiency, equivalent to an overall control efficiency of eighty-four and two tenths percent (84.2%). The destruction efficiency of ninety percent (90%) is required by 326 IAC 8-5-5 (c)(3)(B).

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The input of VOC to the in-line gravure press, EU-52, shall be limited to 1,582 tons of VOC from coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period based on an overall eighty-four and two tenths percent (84.2%) control efficiency. This usage limit is required to limit the potential to emit of VOC to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) When operating, the thermal oxidizer shall maintain a minimum a overall control efficiency of eighty-four and two tenths percent (84.2%).

D.1.3 Hazardous Air Pollutants (HAPs)

The input of hazardous air pollutants to the entire source shall be limited such that after control the entire source shall emit less than ten (10) tons per consecutive twelve (12) month period for a single HAP and less than twenty-five (25) tons per consecutive twelve (12) month period. These limits

make the requirements of 40CFR Part 63 Subpart KK [National Emission Standards for Printing and Publishing Industry] not applicable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5(a)]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaner degreaser facility EU-WT shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-52 and its thermal oxidizer control device.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

- (a) The Permittee is not required to test EU-52 by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC destruction efficiency specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.
- (b) The Permittee is not required to test EU-31, EU-51 and EU-WT by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 HAPs

Compliance with the HAPs usage limitation contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 VOC and HAPs Emissions

Compliance with Conditions D.1.2 and D.1.3 shall be demonstrated at the end of each month based on the total volatile organic compounds as well as single and combination of HAPs usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Monitoring

- (a) Daily records of the thermal oxidizer internal combustion zone (fire box) temperature shall be observed at least once per day when EU-52 is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements - VOC

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the daily internal combustion zone temperature of the thermal oxidizer or indicate that EU-52 was not in operation that day.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) and/or Environmental Data Sheets necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Record Keeping Requirements - HAPs

To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs emission limits established in Condition D.1.3.

- (a) The weight of HAP containing material used, including Environmental Data Sheets, purchase orders and invoices necessary to verify the type and amount used;

- (b) The HAP content (weight percent) of each material used;
- (c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and
- (d) Identification of the facility or facilities associated with the usage of each HAP.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (d) Three (3) cyclone scrap separators, known as EU-C1, EU-C2, and EU-C3, all installed in 1979, exhausted through Stacks 6, 7 and 8, capacity: 1 ton of carton scrap per hour, each.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the cyclone scrap separators shall not exceed 2.75 pounds per hour when operating at a process weight rate of 2,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (f) Two (2) solvent storage tanks, identified as EU-ST-1 and EU-ST-2, installed in 1993, capacity: 15,000 gallons, each.

Record Keeping Requirements [326 IAC 2-8-4(3)]

D.3.1 Record Keeping [326 IAC 12, (40 CFR Part 60.110b, Subpart Kb)]

The two (2) storage tanks EU-ST-1 and EU-ST-2 shall comply with the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb). These tanks are subject to only 40 CFR Part 60.116b, paragraphs (a) and (b) which requires the Permittee to maintain accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Records shall be kept for the life of the storage tanks.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the two (2) 4.9 million British thermal units per hour natural gas-fired boilers shall be limited to 0.8 pounds per million British thermal units heat input.

This limitation is based on the following equation:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}} \quad Pt = \text{lbs of PM emitted per MMBtu heat input}$$

C = maximum ground level concentration (default = 50 µg/m³)

a = plume rise factor (default = 0.67 for Q less than 1,000 MMBtu/hr)

h = stack height in feet

Q = total source maximum operating capacity

N = number of stacks in fuel burning operation

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Determination Requirement

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

- (a) The Permittee is not required to test two (2) natural gas-fired boilers by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

- (b) The Permittee is not required to test degreasing facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Jefferson Smurfit Corporation (U.S.)
Muncie, Indiana
Permit Reviewer: MES

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Jefferson Smurfit Corporation (U.S.)
Source Address: 301 South Butterfield Road, Muncie, Indiana 47303
Mailing Address: 301 South Butterfield Road, Muncie, Indiana 47303
Part 70 Permit No.: T 035-5970-00009

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

Jefferson Smurfit Corporation (U.S.)
Muncie, Indiana
Permit Reviewer: MES

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Jefferson Smurfit Corporation (U.S.)
Source Address: 301 South Butterfield Road, Muncie, Indiana 47303
Mailing Address: 301 South Butterfield Road, Muncie, Indiana 47303
Part 70 Permit No.: T 035-5970-00009

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input type="checkbox"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input type="checkbox"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <ul style="list-style-type: none">• The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:

Date/Time Emergency/Deviation was corrected:

Was the facility being properly operated at the time of the emergency/deviation? Y N

Describe:

Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NO_x, CO, Pb, other:

Estimated amount of pollutant(s) emitted during emergency/deviation:

Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:

Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Jefferson Smurfit Corporation (U.S.)
Muncie, Indiana
Permit Reviewer: MES

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OP No. T 035-5970-00009

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jefferson Smurfit Corporation (U.S.)
Source Address: 301 South Butterfield Road, Muncie, Indiana 47303
Mailing Address: 301 South Butterfield Road, Muncie, Indiana 47303
Part 70 Permit No.: T 035-5970-00009
Facility: In-line gravure press (EU-52)
Parameter: Input of VOC from coatings, dilution solvents, and cleaning solvents taking into account the thermal oxidizer.
Limit: Less than two hundred and fifty (250) tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Jefferson Smurfit Corporation (U.S.)
Muncie, Indiana
Permit Reviewer: MES

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jefferson Smurfit Corporation (U.S.)
Source Address: 301 South Butterfield Road, Muncie, Indiana 47303
Mailing Address: 301 South Butterfield Road, Muncie, Indiana 47303
Part 70 Permit No.: T 035-5970-00009
Facility: Entire Source
Parameter: The input of hazardous air pollutants to the entire source
Limit: Less than ten (10) single and twenty-five (25) tons total HAPS per twelve (12) consecutive month period

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Single HAP	Total HAPS	Single HAP	Total HAPS	Single HAP	Total HAPS

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Jefferson Smurfit Corporation (U.S.)
Muncie, Indiana
Permit Reviewer: MES

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Jefferson Smurfit Corporation (U.S.)
Source Address: 301 South Butterfield Road, Muncie, Indiana 47303
Mailing Address: 301 South Butterfield Road, Muncie, Indiana 47303
Part 70 Permit No.: T 035-5970-00009

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of Each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name:	Jefferson Smurfit Corporation (U.S.)
Source Location:	301 South Butterfield Road, Muncie, Indiana 47303
County:	Delaware
SIC Code:	2657
Operation Permit No.:	T 035-5970-00009
Permit Reviewer:	Frank P. Castelli

On October 3, 1998, the Office of Air Management (OAM) had a notice published in the Muncie Star Press, Muncie, Indiana, stating that Jefferson Smurfit Corporation (U.S.), had applied for a Part 70 Operating Permit to operate a folding carton manufacturing source with control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On October 23, 1998, Scott A Headley, Plant Manager of Jefferson Smurfit Corp., submitted comments on the proposed Part 70 Operating Permit. The comments are as follows and deleted language appears as **strikeouts**; new language is **bolded**:

Comment 1:

Condition B.10, Certification: The condition as written appears overly broad. In order to more clearly identify documents which must be signed by the "responsible official," we would recommend that the following phrase be added to the beginning of the condition. *"Where specifically designated by this permit or required by an applicable requirement, application forms, reports, . . ."*. Individual conditions that require submittal of documents that must be signed by the "responsible official" should be amended to clearly indicate that signature by the "responsible official" is required.

Response 1:

The specific permit conditions requiring submittal of documents will note when the responsible official's certification is required. Change were made as follows:

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) **Where specifically designated by this permit or required by an applicable requirement, any** Any application forms, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

Comment 2:

Condition B.11, Annual Compliance Certification: JSC objects to the level of detail required for the annual compliance certification in Section (c) of this condition. Much of this detail will already have been provided in quarterly or semi-annual compliance or compliance monitoring reports, and therefore requiring this information on the annual compliance certification is duplicative.

Response 2:

If the information requested in Section (c) of Condition B.11 has already been provided in other submittals to IDEM, just copy those submittals and add any information necessary to assure a complete annual compliance certification.

Comment 3:

Condition B.12(b), Preventive Maintenance Plan: We would object to the term "proper maintenance" as used in section (b) of this condition, since it is vague and could lead to disagreements over the level of maintenance that would be considered "proper" to prevent excessive emissions. We would also request that the phrase "or potential to emit" be removed from the end of this section, since it is redundant, confusing and unnecessary. We would specifically recommend that this condition be amended to read as follows:

- (b) The Permittee shall implement the Preventive Maintenance Plan as necessary to ensure that failure to implement the plan does not cause or contribute to a violation of any limitation on emissions."

Response 3:

The interpretation of the phrase "ensure that the lack of proper maintenance" is the same as "that failure to implement the plan" and therefore this wording does not need to be altered. The phrase "potential to emit" can not be deleted since the lack of proper maintenance can increase the potential to emit for certain processes and control devices.

Comment 4:

Condition B.14, Permit Shield: We do not believe that this condition is consistent with the provisions of 326 IAC 2-7-15, especially, section (b) as it is currently worded. Since the wording of paragraph (b) of this condition is somewhat ambiguous with respect to whether former Construction Permit conditions, which are not included in this permit, may still be applicable. We would request that this condition be amended to identify the fact that this permit supercedes all of the conditions in previously issued permits. We would request that section (b) of this condition be deleted from the permit.

Response 4:

This condition is almost exactly the wording required by 326 IAC 2-7-15. 40 CFR 70.6(f) states that the permitting authority may expressly include in a Part 70 permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements. OAM believes non-applicable requirement determinations should be dealt with in Section D. On July 28, 1998, the OAM was notified that the U.S. EPA would object to any Title V Operating Permit that superceded all previous construction permits. The U.S. EPA indicated that they believed that the authority for certain applicable requirements might expire if the construction permits that established them expired. The OAM believes that the regulatory process is best served if all affected parties are able to rely on the Title V Operating Permit to identify all applicable requirements and the means for demonstrating compliance with each requirement.

The OAM intends to continue discussions with the U.S. EPA regarding the issues related to past construction permits. However the OAM also believes that the Permit Shield condition B.14 (b) (1) & (2) establishes that the Title V permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of the permit shall be deemed in compliance with any applicable requirements as of the date of the permit issuance for all the previous permits identified by the source and the OAM during the course of this review.

There has been no change to this condition.

Comment 5:

Condition B.28, Credible Evidence: This condition should be eliminated from the permit since it is beyond the State's authority to include this provision. In addition, the condition is vague and ambiguous, since "credible evidence" is not defined in the permit. As such it inappropriately provides an open-ended basis for determining compliance. We believe that the specific basis for determining compliance is already included in the applicable requirements as detailed in the D sections of the permit, and therefore, this condition is unnecessary and improper.

Response 5:

The IDEM now believes that Condition B.27 is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under this authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~B.27 — Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]—
Notwithstanding the conditions of this permit that state specific methods that may be used
to assess compliance or noncompliance with applicable requirements, other credible
evidence may be used to demonstrate compliance or non-compliance.~~

Comment 6:

Condition C.6, Operation of Equipment: This condition requires that control equipment always be operated when the emission units are vented to the control equipment. Operation of the thermal

oxidizer should not be required when the presses are not using VOC containing materials. We would request that this condition be amended by adding the following phrase to the end of the condition: " .. , *except when the emission units are operated in such a manner that there are no regulated emissions from the units.*" JSC does on occasion operate EU-52 with plain cartons, with no ink being applied. We also may at some time in the future be able to use non-VOC containing materials. We do not want to be required to continue the use of the thermal oxidizer under these conditions.

Response 6:

Condition C.6 has been revised as follows to allow the use of non-VOC containing materials without operating the thermal oxidizer:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation, except when the emission units are operated in such a manner that there are no regulated emissions from these emission units.

Comment 7:

Condition C.13, Temperature Gauge Specifications: We would request that this detailed provision be deleted from the permit, since there is no apparent applicable requirement in state regulations for such a requirement. This condition also incorrectly refers to the measurement of "exhaust temperature," when we measure the internal combustion zone temperature of our thermal oxidizer.

Response 7:

Condition C.13 has been revised to:

C.13 Temperature Gauge Specifications

Whenever a condition in this permit requires the measurement of exhaust temperature at the any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

In order to show that the control device is working properly, temperature is an easily measured parameter which can be related to the destruction efficiency. Since this facility is subject to 326 IAC 8-5-5, the temperature gauge accuracy stated in Condition C.13 is retained.

Comment 8:

Condition C.14, Emergency Reduction Plans: Please find attached an Emergency Reduction Plan for our facility. We would request that this condition be amended to reflect that we have satisfied this requirement through this submittal.

Response 8:

The condition has been replaced by a new Condition C.14 acknowledging the fact that the Emergency Reduction Plan has been submitted with these comments.

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) ~~The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

(b) ~~These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

(c) ~~If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~

(d) ~~These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

(e) ~~Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~

(f) ~~Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

(a) **The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on October 29, 1998.**

(b) **If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.**

(c) **These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.**

(d) **Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.**

(e) **Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]**

Comment 9:

Source Operation Condition C.16, Compliance Monitoring Plan - Failure to Take Response Steps. We do not believe that 40 CFR Part 70, or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of noncompliance with an underlying applicable requirement, which is implied by this permit condition. We would request that all references to a Compliance Response Plan be eliminated from this condition.

Response 9:

The Compliance Response Plan and the Preventive Maintenance Plan are separate documents in part because of a difference in how to determine if the condition is violated. Failure to take the response steps prescribed in the Compliance Response Plan does constitute a violation of the permit. Failure to take an action prescribed in the Preventive Maintenance Plan does not constitute a violation of the permit, unless the failure to take the prescribed action causes a violation of any limitation on emissions or potential to emit.

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit.

This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widgets was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most Permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the Permittee may know from experience, what replacement parts should be kept on hand. The Permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the Permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most Permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance. There are no changes in the condition.

Comment 10:

Condition D.1.1, VOC Limits: Section (b) of this condition should be amended to accurately reflect the requirements of the rule. 326 IAC 8-5-5 requires that packaging rotogravure printing presses meet an overall control efficiency of 65% (capture and control) and that the thermal oxidizer achieve

a destruction efficiency of 90%. This condition should reflect these limits. This section also contains a reference to 326 IAC 8-1-2(a)(2), which provides for the approval of a seasonal exemption for thermal oxidizers. This reference does not appear to have any relevance to this condition for our facility. Lastly, we would request that the following phrase be added to the end of the first sentence in section (a) of this condition: ". . . and when inks containing VOCs are being applied." The addition of this phrase would allow us to run plain cartons through the presses or to use non-VOC containing inks without having to operate the thermal oxidizer.

Response 10:

In order to avoid the applicability of 326 IAC 2-2 (PSD), an eighty-four and two tenths percent (84.2%) overall efficiency is required as specified in Condition D.1.2 rather than that required by 326 IAC 8-5-5. 326 IAC 8-5-5 lists an overall control efficiency of sixty-five percent (65%) (capture and control) for packaging rotogravure printing presses. Therefore, the overall control efficiency stated in Condition D.1.1 can not be changed to sixty-five percent (65%). For clarity, Condition D.1.1(b) and the cite has been revised.

- (b) When operating the thermal oxidizer to achieve the limit for rule 326 IAC 8-5-5, the thermal oxidizer shall maintain a minimum ninety-three and six-tenths (93.6) percent capture efficiency and ninety (90) percent destruction efficiency, **equivalent to an overall control efficiency of eighty-four and two tenths percent (84.2%).** ~~These efficiencies and the use of the thermal oxidizer are required by rule 326 IAC 8-1-2(a)(2). The destruction efficiency of ninety percent (90%) is required by 326 IAC 8-5-5 (c)(3)(B).~~

As stated in Response 6, Condition C.6 has been revised and similarly Condition D.1.1(a) has been revised as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the thermal oxidizer shall operate at all times that EU-52 is in operation. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,260 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum ninety percent (90%) destruction of the volatile organic compound (VOC) captured **and when inks containing VOCs are being applied.**

Comment 11:

Condition D.1.5, Preventive Maintenance Plan: We request that this condition be amended to read as follows:

"A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the thermal oxidizer used for EU-52."

As currently worded this condition would appear to require that we have a preventive maintenance plan for the printing press as well as the thermal oxidizer. There are no appropriate preventive maintenance measures for the presses related to compliance with the applicable rules, and therefore we believe that the preventive maintenance requirement should be limited to the thermal oxidizer.

Response 11:

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

- (1) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);
- (2) Implement the preventive maintenance plan; and,
- (3) Forward to the department upon request the preventive maintenance plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a Preventive Maintenance Plan is required only for:

- (1) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and the unit has existing applicable requirements; and
- (2) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (3) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (4) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

Therefore, Condition D.1.5 has not been changed

Comment 12:

Condition D.1.6, Testing Requirements: Section (b) of this condition should be deleted, since emission units EU-31, EU-51 and EUWT do not have applicable requirements for which any type of compliance testing would be required.

Response 12:

Condition D.1.6 states that no tests are required, but in the future should testing be required to show compliance with any existing or future applicable rules, IDEM has specified how the tests are to be performed. Therefore, Condition D.1.6(b) has not be deleted.

Comment 13:

Condition D.1.10, Monitoring: The first sentence of paragraph (a) should be amended to replace "exhaust" with "firebox," since that is where we measure the thermal oxidizer temperature. We would also request that the last two sentences of this paragraph, which refer to the Compliance Response Plan, be deleted for the reasons stated above in reference to Condition C.16.

Response 13:

Condition D.1.10 has been revised to:

D.1.10 Monitoring

-
- (a) Daily records of the thermal oxidizer ~~exhaust~~ **internal combustion zone (firebox)** temperature shall be observed at least once per day when EU-52 is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

See Response 9 for discussion of why the last two (2) sentences of D.1.10(a) are required.

Comment 14:

Conditions D.1.11 and D.1.12, Record Keeping Requirements for VOCs and HAPS. Several changes are needed to these conditions so that the record keeping requirements more closely match the actual requirements of the applicable rules. First, paragraph (a) of Condition D.1.11 should only refer to Condition D.1.2, and not to D.1.1. Compliance with Condition D.1.1 is demonstrated through the control efficiency of the thermal oxidizer by monitoring temperatures, and not through the control efficiency of the thermal oxidizer by monitoring temperatures, and not through records of ink usage. We would also request that paragraph (a)(1) of Condition D.1.11 and paragraph (a) of Condition D.1.12 be amended to allow the use of Environmental Data Sheets instead of Materials Safety Data Sheets to support the mass balance calculations for the VOC and HAP emission caps. Lastly, we would request that paragraph (a)(2) of Condition D.1.11 be amended to read "A monthly log of use;" since compliance is determined on a monthly rather than on a daily basis.

Response 14:

The record keeping required to show compliance with Condition D.1.1 was inadvertently omitted. The temperature of the internal combustion zone shall be recorded on a daily basis. Thus, Condition D.1.11(a) has been added and the remainder of the record keeping to show compliance with Condition D.1.2 has been renumbered as D.1.11(b).

Paragraphs (b)(1) of Condition D.1.11 and (a) of Condition D.1.12 have been amended to allow the use of Environmental Data Sheets instead of Materials Safety Data Sheets to support the mass balance calculations for the VOC and HAP emission caps.

The log of dates has to reflect what days, i.e., not what months materials are used. Therefore, no change has been made to Condition D.1.11(b)(2).

D.1.11 Record Keeping Requirements - VOC

- (a) **To document compliance with Condition D.1.1, the Permittee shall maintain records of the daily internal combustion zone temperature of the thermal oxidizer or indicate that EU-52 was not in operation that day.**
- (a)(b) To document compliance with Conditions ~~D.1.1 and D.1.2~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for

(1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) **and/or Environmental Data Sheets** necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for month; and
- (5) The weight of VOCs emitted for each compliance period.

(b)(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12

- (a) The weight of HAP containing material used, including **Environmental Data Sheets**, purchase orders and invoices necessary to verify the type and amount used;

Comment 15:

Technical Support Document (TSD): The TSD contains the following errors which should be corrected:

- (a) On page 2, the two solvent storage tanks (EU-ST-1 & 2) are identified as unpermitted facilities. These two storage tanks have potential emissions below the 3 lb/hr or 15 lb/day threshold for permitting found in 326 IAC 2-1. As such these units were not required to have been permitted, and should not be identified as unpermitted facilities.
- (b) On page 4, the correct date for the notice of completeness letter is May 15, 1997 rather than May 13, 1997.
- (c) On page 6, the note below the first table should indicate that the VOC emissions from EU-52 are limited to 250 tons/year rather than 2 tons/year.
- (d) On page 10, in the paragraph designated as (c), it should indicate that the fire-box temperature should be recorded rather than the exhaust temperature.

Response 15:

- (a) The two (2) solvent storage tanks (EU-ST-1 & 2) could have had an exemption but did not have to. Therefore, the two (2) solvent storage tanks are not considered unpermitted. Section D.3 remains unchanged since these tanks are subject to New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb).

Therefore, the Technical Support Document should have listed the equipment as follows:

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) solvent-based seven (7) station, thirty-six (36) inch wide roll-to-roll gravure press, known as EU-51, installed in 1969, exhausted through Stacks 1, 2 and 3, capacity: 9,000 pounds of cartons per hour.
- (b) One (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press known as EU-52, installed on June 15, 1980, equipped with a thermal oxidizer, known as EU-52-I, rated at 12.8 million British thermal units per hour, exhausted through Stack 4, capacity: 14,500 pounds of cartons per hour.
- (c) One (1) water-based three (3) station forty-six (46) inch wide press, consisting of two (2) flexographic printing stations and one (1) gravure station, known as EU-31, exhausted through Stack 5, installed in 1968, capacity: 6,000 pounds of cartons per hour.
- (d) Three (3) cyclone scrap separators, known as EU-C1, EU-C2, and EU-C3, all installed in 1979, exhausted through Stacks 6, 7 and 8, capacity: 1 ton of carton scrap per hour, each.
- (e) Two (2) solvent storage tanks, identified as EU-ST-1 and EU-ST-2, installed in 1993, capacity: 15,000 gallons, each.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (f) One (1) cleanup and wash tank, identified as EU-WT, exhausted to Stack 9, installed in 1991, capacity: 4.77 gallons per day of solvent consumption.
- (b) The date of completeness is duly noted as May 15, 1997.
- (c) On page 6 of the TSD, the note should have stated that "VOC emissions from EU-52 are limited to **less than 250 tons per year.**"
- (d) Responses 7 and 13 implement this recommended change in the permit.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit:

1. Condition C.2 has been updated to reflect the revision in 326 IAC 5-1-2 dated November 1, 1998.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions-Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions opacity shall meet the following, unless otherwise stated in this permit:

— Jefferson Smurfit Corporation (U.S.)
Muncie, Indiana
Permit Reviewer: MES

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- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) opacity in ~~twenty-four (24) consecutive readings~~; any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	Jefferson Smurfit Corporation (U.S.)
Source Location:	301 South Butterfield Road, Muncie, Indiana 47303
County:	Delaware
SIC Code:	2657
Operation Permit No.:	T 035-5970-00009
Permit Reviewer:	Frank P. Castelli

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Jefferson Smurfit Corporation (U.S.) relating to the operation of a folding carton manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) solvent-based seven (7) station, thirty-six (36) inch wide roll-to-roll gravure press, known as EU-51, installed in 1969, exhausted through Stacks 1, 2 and 3, capacity: 9,000 pounds of cartons per hour.
- (b) One (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press known as EU-52, installed on June 15, 1980, equipped with a thermal oxidizer, known as EU-52-I, rated at 12.8 million British thermal units per hour, exhausted through Stack 4, capacity: 14,500 pounds of cartons per hour.
- (c) One (1) water-based three (3) station forty-six (46) inch wide press, consisting of two (2) flexographic printing stations and one (1) gravure station, known as EU-31, exhausted through Stack 5, installed in 1968, capacity: 6,000 pounds of cartons per hour.
- (d) Three (3) cyclone scrap separators, known as EU-C1, EU-C2, and EU-C3, all installed in 1979, exhausted through Stacks 6, 7 and 8, capacity: 1 ton of carton scrap per hour, each.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (e) One (1) cleanup and wash tank, identified as EU-WT, exhausted to Stack 9, installed in 1991, capacity: 4.77 gallons per day of solvent consumption.
- (f) Two (2) solvent storage tanks, identified as EU-ST-1 and EU-ST-2, installed in 1993, capacity: 15,000 gallons, each.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Combustion source flame safety purging on startup.
- (c) The following VOC and HAP storage containers:
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (f) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (g) Closed loop heating and cooling systems.
- (h) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (i) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (j) Heat exchanger cleaning and repair.
- (k) Paved and unpaved roads and parking lots with public access.

- (l) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (n) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (o) On-site fire and emergency response training approved by the department.
- (p) Other activities or categories not previously identified:
 - (1) Finish department activities, including seven (7) gluers.
 - (2) One (1) ink mixer.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following: list permits, registrations, modifications, exemptions, etc.

- (a) Operating Permit # 18-04-92-0252, issued on August 19, 1988, and
- (b) Operating Permit # 18-04-92-0253, issued on August 19, 1988.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

Operating Permit # 18-04-92-0252, issued on August 19, 1988

Condition 4 limiting VOC emissions from EU-52 to 258 tons per year has been changed to a 249 ton per year limit. This was done to avoid major PSD status for EU-52 pursuant to 326 IAC 2-2. The source has agreed to this revision.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 31, 1996. Additional information was received on December 16, 1997, June 1, 1998 and July 30, 1998.

A notice of completeness letter was mailed to the source on May 13, 1997.

Emission Calculations

See Appendix A pages 1 and 2 of 2 of this document for detailed emissions calculations of the supplemental natural gas combustion of the thermal oxidizer and a summary of the potential and actual emissions for the entire source.

The potential volatile organic compounds emissions from the cold cleaner degreaser wash tank, EU-WT are as follows:

Daily S-147 solvent consumption = 4.77 gallons per day
Solvent density = 7.33 pounds per gallon

Therefore the potential VOC emissions are calculated by
 $4.77 \text{ gal/day} * 7.33 \text{ lbs/gal} * 365 \text{ days/yr} * 1 \text{ ton/2000 lbs} = 6.38 \text{ tons/yr}$

The HAPs from the cold cleaner degreaser wash tank, EU-WT, based on 10 percent xylene and 10 percent MIBK in S-147 solvent are 0.638 tons per year of xylene and MIBK, each.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM ₁₀	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
xylene	less than 10
MIBK	less than 10
ethyl benzene	less than 10
toluene	less than 10
glycol ethers	less than 10
TOTAL	less than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data for the criteria pollutants and the applicants values for the HAPS.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM ₁₀	0.00
SO ₂	0.00
VOC	177
CO	0.00
NO _x	0.00
xylene	1.65
ethyl benzene	0.464
toluene	0.194
glycol ethers	0.078

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Limited Potential to Emit (tons/year)							
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPS
Scrap Cyclones	negligible	negligible	0.00	0.00	0.00	0.00	0.00
Press EU-51 and EU-31	0.00	0.00	0.00	greater than 100	0.00	0.00	less than 25
Press EU-52 with Thermal Oxidizer	0.768	0.768	0.034	less than 250*	1.96	7.85	less than 25
Wash Tank, EU-WT	0.00	0.00	0.00	6.38	0.00	0.00	1.28
Two (2) Storage Tanks (EU-ST 1 & 2)	0.00	0.00	0.00	0.351	0.00	0.00	0.200
Insignificant Activities	5.00	5.00	2.00	10.0	3.00	4.00	1.00
Total Emissions	5.77	5.77	2.03	greater than 250	4.96	11.9	24.0**

*VOC emissions from EU-52 limited to 2 tons per year. **Single HAPS from the entire source are limited to less than 10 tons per year and total HAPS limited to less than 25 tons per year to avoid the applicability of NESHAP 40 CFR Part 63, Subpart KK.

County Attainment Status

The source is located in Muncie County.

Pollutant	Status
TSP	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Muncie County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The two (2) 15,000 gallon solvent storage tanks, identified as EU-ST-1 and EU-ST-2, installed in 1993, are subject to the requirements 40 CFR 60.110b, Subpart Kb (Volatile Organic Liquid Storage Vessels):

Pursuant to 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), the Permittee shall:

- (1) Keep readily accessible records showing the dimensions of the storage vessel, and an analysis showing the capacity of the storage vessel; (for the life of the source)
 - (2) Notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds 0.745 (5.2 kiloPascals).
- (b) The source is not subject to the requirements of 40 CFR 60, Subpart RR (Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations), since the source does not manufacture pressure sensitive tapes or labels.
- (c) The degreasing operation, EU-WT, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart T, (Halo-generated Solvent Cleaning Machine NESHAP) because it uses a solvent which is not part of the applicability as specified in 40 CFR Part 63, Subpart T.
- (d) The rotogravure presses are not subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart KK because HAPs are limited to below the major source levels. The HAPs from the entire source will be limited to less than ten (10) and twenty-five (25) tons per year for a single and combination of HAPs, respectively.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD Rules)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), only EU-52, EU-WT, EU-ST-1 and EU-ST-2 were constructed after the applicability date of the August 7, 1977. The VOC emissions from this press, EU-52 are limited to 249 tons per year. The addition of the two other emission units now makes this source an existing major source under these rules.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6, Emission Reporting, because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds in Delaware County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2, Visible Emissions Limitations, except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New facilities: general reduction requirements)

Pursuant to 326 IAC 8-1-6, the Roll to Roll Gravure Press, EU-51, and the Flexo Printing Press, EU-31, are not subject to this rule, even though potential VOC emissions are greater than 25 tons per year, because these facilities were constructed prior to January 1, 1980.

326 IAC 8-3-2 (Cold Cleaner Operations)

The degreasing activities performed in the wash tank, EU-WT shall comply with this rule that requires work place standards in the operation of degreasing facilities.

326 IAC 8-5-5 (Graphic Arts Operations)

- (a) EU-31 and EU-51 were both constructed prior to the November 1, 1980 applicability date of this rule pursuant to 326 8-5-1(1). Therefore this rule does not apply to these facilities.
- (b) Since the in-line gravure press, EU-52, installed in June 1980 has the potential to emit more than one hundred (100) tons per year of VOC, this rule is applicable. The thermal oxidizer with a capture efficiency of 85.0 percent and a destruction efficiency of 99.0 percent, for an overall control efficiency of 84.2 percent, satisfies the requirements of 326 IAC 8-5-5(c)(3)(B) rule which requires an incineration system that oxidizes 90 percent of the non-methane VOCs.

326 IAC 8-6 (Organic solvent emission limitations)

Pursuant to 326 IAC 8-6 (Organic solvent emission limitations), the Roll to Roll Gravure Press, EU-51 and the Flexo Printing Press, EU-31, are not subject to this rule, because these facilities were constructed prior to the October 7, 1974 applicability date of this rule.

There are no other 326 IAC 8 rules that apply.

326 IAC 6-2-3 (Particulate emission limitations) Insignificant Natural Gas-Fired Boilers

Pursuant to 326 IAC 6-2-3 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from indirect heating facilities existing and in operation before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}} \quad Pt = \text{lbs of PM emitted per MMBtu heat input}$$

C = maximum ground level concentration (default = 50 $\mu\text{g}/\text{m}^3$)
a = plume rise factor (default = 0.67 for Q less than 1,000 MMBtu/hr)
h = stack height in feet
Q = total source maximum operating capacity
N = number of stacks in fuel burning operation

$$Pt = \frac{50 \text{ u/m}^3 * 0.67 * 25}{76.5 * 9.8^{0.75} * 2^{0.25}} = 1.66 \text{ pounds of particulate matter emitted per MMBtu heat input}$$

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from two (2) boilers rated at 4.9 million British thermal units per hour each, installed in 1968, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

326 IAC 6-3-2 (c) (Process Operations)

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the cyclone scrap separators, known as EU-C1, EU-C2 and EU-C3 operations shall not exceed 2.75 pounds per hour, each. This emission rate was determined from the following formula:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The cyclone scrap separators, known as EU-C1, C2 and C3 have negligible PM emissions and therefore comply with this rule.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The printing operations including the thermal oxidizer have applicable compliance monitoring conditions as specified below:

- (a) The amount of VOC delivered to the applicators for in-line Roto graveure Press, EU-52 including cleanup solvents must be monitored and recorded on a monthly basis.
- (b) The amount of any single HAP and the combination of HAPs delivered to the applicators including cleanup solvents for Presses EU-31, EU-51, and EU-52 as well as the amount of any single HAP and the combination of HAPs consumed by the wash tank, EU-WT, must be monitored and recorded on a monthly basis.
- (c) The Permittee shall record the exhaust temperature of the thermal oxidizer, at least once daily when EU-52 is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the exhaust temperature shall be maintained at a minimum operating temperature of 1,260 degrees Fahrenheit as determined by the stack test report dated December 23, 1997 or a temperature range determined by the later stack test to maintain at least 90 percent destruction of VOC captured. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the temperature reading is outside of the specified temperature or range of temperatures for any one reading.

These monitoring conditions are necessary because the thermal oxidizer on EU-52 must operate properly to ensure compliance with 326 IAC 8-5-5, 326 IAC 2-7 (Part 70) and to avoid applicability of 326 IAC 2-2 and 40 CFR Part 63, Subpart KK.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) Page 2 of 2 of Appendix A for summaries of the air toxic emissions.

Conclusion

The operation of this folding carton manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T 035-5970-00009.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
 10 < MM BTU/HR <100
 Small Industrial Boiler

Company Name: Jefferson Smurfit Corporation (U.S.)
Address City IN Zip: 301 South Butterfield Road, Muncie, Indiana 47303
Part 70: T 035-5970
Pit ID: 035-00009
Reviewer: Frank P. Castelli
Date: May 31, 1996

Thermal Oxidizer (EU-52 I)

Heat Input Capacity

MMBtu/hr

12.8

Potential Throughput

MMCF/yr

112.1

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	0.768	0.768	0.034	7.85	0.157	1.96

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Potential Emissions Calculations

VOC and HAPS

From Surface Coating Operations

Company Name: Jefferson Smurfit Corporation (U.S.)

Address City IN Zip: 301 South Butterfield Road, Muncie, Indiana 47303

Part 70 : T 035-5970

Plt ID: 035-00009

Reviewer: Frank P. Castelli

Date: May 31, 1996

Control Efficiency = 90%

Entire Source

	1997 Actual Usage (6,000 hours)	Potential Uncontrolled (tons/yr)	Potential Controlled (tons/yr)
Toluene	0.194	0.283	0.028
Ethyl benzene	0.464	0.677	0.068
Xylene	1.65	2.41	0.241
Glycol ethers	0.078	0.113	0.011
Total HAPS	2.38	3.48	0.348
VOC			
Actual 1996 Emissions = 177 tons			
Potential VOC = 1,110 tons/yr from AIRS			

